

1 WILDE & ASSOCIATES
2 Gregory L. Wilde, Esq.
3 Nevada Bar No. 004417
4 208 South Jones Boulevard
5 Las Vegas, Nevada 89107
6 Telephone: 702 258-8200
7 bk@wildelaw.com
8 Fax: 702 258-8787

Electronically Filed on _____

6 and

7 MARK S. BOSCO, ESQ.
8 Arizona Bar No. 010167
9 TIFFANY & BOSCO, P.A.
10 2525 East Camelback Road, Suite 300
11 Phoenix, Arizona 85016
12 Telephone: (602) 255-6000

11 09-75557

12 **UNITED STATES BANKRUPTCY COURT**
13 **DISTRICT OF NEVADA**

14 In Re:

15 Kathern Centanaro,

18 Debtor.

BK Case No. 09-16847-lbr

Date: August 13, 2009

Time: 3:30 p.m.

Chapter 13

19 **LIMITED RESPONSE TO DEBTOR'S MOTION TO VALUE COLLATERAL, "STRIP OFF"**
20 **AND MODIFY RIGHTS OF COUNTRYWIDE HOME LENDING (SECOND MORTGAGE)**
21

22 COMES NOW, by and through the undersigned counsel, and files this limited response to
23 Debtor's Motion to Value Collateral, "Strip Off" and modify rights of Thomas Charl Wesner, Jr. and
24 Yuko Wiesner stating as follows:

25 ///

26 ///

1 Secured Creditor does not oppose the relief sought by the Debtor's as long as there is language
2 in the subsequent order noting that the subject lien is "stripped", and/or extinguished, only upon the
3 completion of the Debtors Chapter 13 plan and they receive a discharge.

4 DATED 8/12/09.

5 WILDE & ASSOCIATES

6
7 By /S/GREGORY L. WILDE
8 **GREGORY L. WILDE, ESQ.**
9 Attorneys for Secured Creditor
10 208 South Jones Boulevard
11 Las Vegas, Nevada 89107
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

1 WILDE & ASSOCIATES
2 Gregory L. Wilde, Esq.
3 Nevada Bar No. 004417
4 208 South Jones Boulevard
5 Las Vegas, Nevada 89107
6 Telephone: 702 258-8200
7 Fax: 702 258-8787
8 bk@wildelaw.com

9 and

10 MARK S. BOSCO, ESQ.
11 Arizona Bar No. 010167
12 TIFFANY & BOSCO, P.A.
13 2525 East Camelback Road, Suite 300
14 Phoenix, Arizona 85016
15 Telephone: (602) 255-6000
16 BAC Home Loan Servicing, L.P. fka Countrywide Home Loans Servicing, L.P.
17 09-75557

18 **UNITED STATES BANKRUPTCY COURT**
19 **DISTRICT OF NEVADA**

20 In Re:

21 Kathern Centanaro,

22 Debtor.

BK Case No. 09-16847-lbr

Date: August 13, 2009

Time: 3:30 p.m.

Chapter 13

23 **CERTIFICATE OF SERVICE**

24 1. On 8-12-09 I served the following document(s):

25 **Limited Response to Debtor's Motion To Value Collateral, "Strip Off" and Modify**
26 **Rights of Countrywide Home Lending (Second Mortgage)**

2. I served the above-named document(s) by the following means to the persons as listed below:

☒ a. ECF System

Randolph Goldberg
randolphgoldberg@yahoo.com
Debtor's counsel

Kathleen A Leavitt
courtsecf3@las13.com
Trustee

X b. United States mail, postage fully prepaid:

Kathern Centanaro
6446 Silent Sun
Las Vegas, NV 89142
Debtors

☐ **c. Personal Service** (List persons and addresses. Attach additional paper if necessary)

I personally delivered the document(s) to the persons at these addresses:

☐ 1. For a party represented by an attorney, delivery was made by handing the document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by leaving the document(s) in a conspicuous place in the office.

N/A

☐ 2. For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

N/A

☐ **d. By direct mail (as opposed to through the ECF System)**

(List persons and email addresses. Attach additional paper if necessary)

Based upon the written assignment of the parties to accept service by email or a court order. I caused the document(s) to be sent to the persons at the mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **e. By fax transmission** *(List persons and fax numbers. Attach additional paper if necessary)*

1 Based upon the written assignment of the parties to accept service by fax transmission or a court order. I
2 faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that
3 I used. A copy of the record of the fax transmission is attached.
4

5 ☐ **f. By messenger** *(List persons and addresses. Attach additional paper if necessary)*
6

7 I served the document(s) by placing them in an envelope or package addressed to the persons at the
8 addresses listed below and providing them to a messenger for service.

9 *(A declaration by the messenger must be attached to this Certificate of Service).*

10 **I declare under penalty of perjury that the foregoing is true and correct.**

11
12 Signed on: 8-12-09

13 
14 An Associate of Wilde & Associates
15
16
17
18
19
20
21
22
23
24
25
26